

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING FOAMS  
PRODUCTS LIABILITY LITIGATION

Master Docket No.: 2:18-mn-2873-RMG

**This document relates to:**  
See Exhibit A Attached Hereto

**STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs in the actions identified in Exhibit A attached hereto and Defendants Tyco Fire Products LP (“Tyco”), Chemguard, Inc. (“Chemguard”), and ChemDesign Products, Inc. (“ChemDesign”) hereby stipulate and agree to a dismissal with prejudice of all Plaintiffs’ Claims against Tyco, Chemguard, ChemDesign, and any other Released Parties<sup>1</sup> in the actions identified in Exhibit A pursuant to Plaintiffs’ decision to participate in the Settlement Agreement Between Public Water Systems and Tyco dated April 12, 2024 (the “Settlement Agreement”), which received final approval on November 22, 2024, from the Court overseeing *In Re: Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2:18-mn-2873 (D.S.C.).

Each party shall bear its own costs.

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<sup>1</sup> Unless otherwise indicated, all capitalized terms in this motion have the meaning given to them in the Settlement Agreement.

Dated: May 13, 2025

/s/Stephen T. Sullivan, Jr.

Stephen T. Sullivan, Jr.

John E. Keefe, Jr.

KEEFE LAW FIRM

2 Bridge Avenue, Suite 623

Red Bank, NJ 07701

(732) 224-9400

ssullivan@keefe-lawfirm.com

jkeefe@keefe-lawfirm.com

*Counsel for Plaintiffs Listed on Exhibit*

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Respectfully submitted,

/s/ Liam J. Montgomery

Liam J. Montgomery

WILLIAMS & CONNOLLY LLP

680 Maine Ave SW

Washington, DC 20024

(202) 434-5000

lmontgomery@wc.com

*Counsel for Defendants Tyco Fire Products LP  
and Chemguard, Inc.*

/s/ Jonathan B. Blakley

Jonathan B. Blakley

Gordon Rees Scully Mansukhani

One North Wacker, Suite 1600

Chicago, IL 60606

(312) 619-4915

jblakley@grsm.com

*Counsel for ChemDesign Products Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Stephen T. Sullivan, Jr.  
Stephen T. Sullivan, Jr.